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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)
)
 v.)
)
MICHAEL CEASE)

~~JUDGE GETTLEMAN~~

No. 09 CR 878

Violation: Title 18, United States Code,
Section 666(a)(1)(B)

MAGISTRATE JUDGE DENLOW

The SPECIAL AUGUST 2009-1 GRAND JURY charges:

1. At times material to this indictment:

A. The City of Chicago was a local government in the State of Illinois receiving federal funding in excess of \$10,000 in a twelve month period from October 1, 2008, through September 30, 2009.

B. Defendant MICHAEL CEASE was employed by the City of Chicago's Department of Environment as a senior environmental inspector. In that capacity, CEASE's duties included inspecting complaints of environmental violations of the City of Chicago's Municipal Code, issuing citations where violations of the City of Chicago's Municipal Code had occurred, and inspecting sites to ensure that violations of the City of Chicago's Municipal Code had been corrected.

C. According to Sections 11-4-2180 and 11-4-2200 of the City of Chicago's Municipal Code:

i. The failure to maintain a facility so that there is neither damaged friable asbestos nor asbestos containing material in poor condition could result in a fine of \$2,000 to \$5,000 for residential structures with more than four units; and

ii. The presence of hazardous asbestos containing material in open and unsecured, or abandoned buildings, facilities, or other structures, is a public nuisance, which could result in a fine of \$5,000 to \$10,000 for residential structures with more than four units.

D. Individual A was the owner of a residential building with more than four units located on the 5700 block of West Seminole Street in Chicago.

2. Beginning in or around August 2009, and continuing to on or about September 15, 2009, at Chicago, in the Northern District of Illinois, Eastern Division,

MICHAEL CEASE,

as an agent of the City of Chicago, a local government receiving federal funding in excess of \$10,000 in a twelve-month period from October 1, 2008, through September 30, 2009, corruptly solicited and demanded, and accepted and agreed to accept, things of value, namely approximately \$1,150, from Individual A, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of the City of Chicago,

namely, the resolution of violations of the City of Chicago's Municipal Code, which had a value of \$5,000 or more;

In violation of Title 18, United States Code, Section 666(a)(1)(B).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY